EXHIBIT 2

Edgen Murray Corporation's First Amended Complaint

IN THE UNITED STATES BANKRUPTCY COURT FOR THE SOUTHERN DISTRICT OF TEXAS HOUSTON DIVISION

In re:	§	
	§	Chapter 11
PERMICO MIDSTREAM PARTNERS	§	_
HOLDINGS, LLC, et al.,	§	Case No. 20-32437 (MI)
	§	
Debtors	§	(Jointly Administered)
	§	
	_ 	
EDGEN MURRAY CORPORATION,	§	
	§	
Plaintiff,	§	
	§	
v.	§	Adversary No. 20-03173
	§	
PERMICO MIDSTREAM PARTNERS,	§	
LLC and HGC MIDSTREAM INV LLC,	§	
	§	
Defendants.	§	

DECLARATION OF CHRIS HOLLAND

Pursuant to 28 U.S.C. § 1746, I declare as follows:

- 1. My name is Chris Holland. I am at least 21 years of age, of sound mind, capable of making this declaration on personal knowledge, and fully competent to testify to the matters stated herein.
- 2. I am the Chief Executive Officer of Swan Pipeline Services, LLC ("Swan").
- 3. I am aware that Permico Midstream Partners, LLC ("Permico") and Edgen Murray Corporation ("Edgen") entered into several Purchase Orders for the sale and purchase of a substantial quantity of line pipe ("Pipe").
- 4. I was involved in and have personal knowledge of arranging and coordinating shipping and storage of the Pipe with Edgen and Permico, and Oso Development Partners, LLC ("Oso") on behalf of Swan at several Swan Yards.
- 5. During a visit to the mill in July 2019, I learned that they did not have space on site to store the Pipe. Swan agreed to receive the Pipe at the Swan Yards.

- 6. Sometime prior to shipping or delivery of the Pipe to the Swan Yards, I understood and agreed on behalf of Swan that Swan would not release any Pipe to Permico, Oso, or any other third party without authorization and approval from Edgen.
- 7. Swan commenced offloading Pipe from railcars around the second week of September 2019, and stored the Pipe thereafter at the Swan Yards until it was instructed by Edgen to release the Pipe over the last several months of 2022.

I declare under penalty of perjury that the foregoing is true and correct. Executed on September $\frac{30}{}$, 2022.

Chris Holland